

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

SKAT TAX REFUND SCHEME LITIGATION

This document relates to: 1:19-cv-01867-LAK, 1:19-cv-01868-LAK, 1:19-cv-01869-LAK, 1:19-cv-01895-LAK, 1:19-cv-01896-LAK, 1:19-cv-01898-LAK, 1:19-cv-01904-LAK, 1:19-cv-01865-LAK, 1:19-cv-01866-LAK, 1:19-cv-01871-LAK, 1:19-cv-01873-LAK, 1:19-cv-01894-LAK, 1:19-cv-01930-LAK, 1:19-cv-01893-LAK, 1:19-cv-01906, 1:19-cv-01911, 1:19-cv-01924, 1:19-cv-01781-LAK, 1:19-cv-01785-LAK, 1:19-cv-01791-LAK, 1:19-cv-01783-LAK, 1:19-cv-01788-LAK, 1:19-cv-01794-LAK, 1:19-cv-01798-LAK, 1:19-cv-01918-LAK, 1:19-cv-01922-LAK, 1:19-cv-01926-LAK, 1:19-cv-01928-LAK, 1:19-cv-01929-LAK, 1:19-cv-01931-LAK, 1:19-cv-01800-LAK, 1:19-cv-01803-LAK, 1:19-cv-01809-LAK, 1:19-cv-01812-LAK, 1:19-cv-01818-LAK, 1:19-cv-01792-LAK, 1:19-cv-01806-LAK, 1:19-cv-01808-LAK, 1:19-cv-01815-LAK, 1:19-cv-01870-LAK, 1:19-cv-01801-LAK, 1:19-cv-01810-LAK, 1:19-cv-01813-LAK

Master Docket 18-md-02865 (LAK)  
ECF Case

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**STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO RESPOND TO THE COMPLAINTS**

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**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned counsel for the parties that the current May 13, 2019 deadline for Defendants in the cases enumerated in the caption to answer or file a motion in response to the Complaints is hereby extended thirty (30) days up to and including June 12, 2019.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaints.

Dated: May 3, 2019  
New York, New York

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Hadron Industries LLC Roth 401(K) Plan,  
RJM Capital Pension Plan, and Routt  
Capital Pension Plan*

/s/ Sharon L. McCarthy

*(e-signed with consent)*

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Omineca Pension Plan, Starfish Capital  
Management LLC Roth 401(K) Plan, Tarvos  
Pension Plan, and Voojo Productions LLC  
Roth 401(K) Plan*

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SO ORDERED:

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Hon. Lewis A. Kaplan  
United States District Judge